

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:)	PROMESA
)	Title III
THE FINANCIAL OVERSIGHT AND)	
MANAGEMENT BOARD FOR PUERTO RICO)	Case No. 17-BK-03283 (LTS)
)	
as representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO, ET)	
AL.,)	
)	
Debtors. ¹)	
)	
In re:)	PROMESA
)	Title III
THE FINANCIAL OVERSIGHT AND)	
MANAGEMENT BOARD FOR PUERTO RICO)	Case No. 17-BK-03566 (LTS)
)	
as representative of)	
)	
THE EMPLOYEES RETIREMENT SYSTEM OF)	
THE GOVERNMENT OF THE COMMONWEALTH)	
OF PUERTO RICO,)	
)	
Debtor.)	
)	

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK- 3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK- 4780) (Last Four Digits of Federal Tax ID: 3747).

THE SPECIAL CLAIMS COMMITTEE OF THE)
FINANCIAL OVERSIGHT AND MANAGEMENT)
BOARD FOR PUERTO RICO, ACTING BY AND)
THROUGH ITS MEMBERS,)
and)
)

THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)
)

as co-trustees of)
)

THE EMPLOYEES RETIREMENT SYSTEM OF)
THE GOVERNMENT OF PUERTO RICO,)
)

Plaintiff,)
)

v.)
)

DEFENDANT 1M, ET AL.,)
)

Defendants.)
)

THE SPECIAL CLAIMS COMMITTEE OF THE)
FINANCIAL OVERSIGHT AND MANAGEMENT)
BOARD FOR PUERTO RICO, ACTING BY AND)
THROUGH ITS MEMBERS,)
)

and)
)

THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)
)

as co-trustees of)
)

THE EMPLOYEES RETIREMENT SYSTEM OF)
THE GOVERNMENT OF PUERTO RICO,)
)

Plaintiff,)
)

v.)
)

STOEVER GLASS & CO., ET AL.,)
)

Defendants.)
)

Adv. Proc. No. 19-00356 (LTS)

Adv. Proc. No. 19-00357 (LTS)

THE SPECIAL CLAIMS COMMITTEE OF THE)
FINANCIAL OVERSIGHT AND MANAGEMENT)
BOARD FOR PUERTO RICO, ACTING BY AND)
THROUGH ITS MEMBERS,)
) Adv. Proc. No. 19-00359 (LTS)
and)
THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)
) as co-trustees of)
THE EMPLOYEES RETIREMENT SYSTEM OF)
THE GOVERNMENT OF PUERTO RICO,)
) Plaintiff,)
v.)
DEFENDANT 1H-78H,)
) Defendants.)
)

)

THE SPECIAL CLAIMS COMMITTEE OF THE)
FINANCIAL OVERSIGHT AND MANAGEMENT)
BOARD FOR PUERTO RICO, ACTING BY AND)
THROUGH ITS MEMBERS,)
) Adv. Proc. No. 19-00361 (LTS)
and)
THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)
) as co-trustees of)
THE EMPLOYEES RETIREMENT SYSTEM OF)
THE GOVERNMENT OF PUERTO RICO,)
) Plaintiff,)
v.)
DEFENDANT 1G-50G, ET AL.,)
) Defendants.)

THE FINANCIAL OVERSIGHT AND)
MANAGEMENT BOARD FOR PUERTO RICO,) Adv. Proc. No. 19-00366 (LTS)
)
as representative of)
)
EMPLOYEES RETIREMENT SYSTEM OF THE)
GOVERNMENT OF THE COMMONWEALTH OF)
PUERTO RICO,)
)
and)
)
THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)
)
as section 926 trustee of)
)
THE COMMONWEALTH OF PUERTO RICO,)
)
Plaintiffs,)
)
v.)
)
ANDALUSIAN GLOBAL DESIGNATED)
ACTIVITY COMPANY, ET AL.,)
)
Defendants.)
)

THE FINANCIAL OVERSIGHT AND)
MANAGEMENT BOARD FOR PUERTO RICO,) Adv. Proc. No. 19-00367 (LTS)
)
as representative of)
)
EMPLOYEES RETIREMENT SYSTEM OF THE)
GOVERNMENT OF THE COMMONWEALTH OF)
PUERTO RICO,)
)
and)
)
THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)
)
as section 926 trustee of)
)
THE COMMONWEALTH OF PUERTO RICO,)
)
Plaintiffs,)
)
v.)
)
GLENDON OPPORTUNITIES FUND, L.P., ET AL.,)
)
Defendants.)
)
)

**OVERSIGHT BOARD'S NOTICE OF RULE 30(b)(6) DEPOSITION OF
OCHER ROSE, L.L.C.**

TO: Ocher Rose, L.L.C.

Pursuant to the *Order Granting Urgent Joint Motion to Modify Order Regarding Stay and Mandatory Mediation with Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [17-bk-3283 ECF 8962] (the “ERS Scheduling

Order”), in connection with (i) the Ultra Vires Issue,² and (ii) the Lien Scope Issues:³

PLEASE TAKE NOTICE THAT, pursuant to Federal Rules of Civil Procedure 26 and 30(b)(6), made applicable to this proceeding by Section 310 of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”) (48 U.S.C. §§ 2101–2241), and Federal Rules of Bankruptcy Procedure 9014, 7026, and 7030(b)(6), the Official Committee of Unsecured Creditors (the “Creditors’ Committee”),⁴ the Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “Retiree Committee” and, together with the Creditors’ Committee, the “Committees”), the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico (the “SCC”) and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and, together with the Oversight Board and the SCC, the “Government Parties”) (together, the “Committees and Government Parties”) will take the deposition upon oral examination of Ocher Rose, L.L.C. through individuals designated to testify regarding the topics of examination set forth in the attached Schedule A hereto.

PLEASE TAKE FURTHER NOTICE THAT the deposition will take place on January

² The Ultra Vires Issue was raised in the Unsecured Creditors’ Committee’s objections to claims of ERS bondholders [17-bk-3283, ECF 5580 and 5586] (the “Creditors’ Committee Objections”); the Retiree Committee’s objection to claims of ERS bondholders [17-bk-3283, ECF 6482] (the “Retiree Committee Objection”); and in count one of the complaints in each of the ERS clawback adversary proceedings [19-ap-355, 19-ap-356, 19-ap-357, 19-ap-358, 19-ap-359, 19-ap-360 and 19-ap-361].

³ The Lien Scope Issues were raised in adversary proceedings 19-ap-366 and 19-ap-367; Parts III, IV, V and ¶ 94–97 of Part VI of the Retiree Committee’s Objection; and Part I.A.i. of the Oversight Board’s objection to claims of ERS bondholders [17-bk-3283, ECF 7075] (the “Oversight Board Objection”).

⁴ The Creditors’ Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

21, 2020, starting at 9:00 a.m. local time at the offices of Proskauer Rose LLP, located at Eleven Times Square, New York, NY 10036, or at such other date, time, or location as the parties may agree or as may be ordered by the Court. Testimony will be recorded by video recording, audio recording, instant visual display of testimony, and by stenographic means before an officer duly authorized by law to take testimony and administer oaths, and will continue from day to day except Sundays and holidays until completed.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Federal Rule of Civil Procedure 30(b)(6) and Federal Rules of Bankruptcy Procedure 9014 and 7030(b)(6), Ocher Rose, L.L.C. is not a natural person and is required to designate and produce one or more officers, directors, managing agents, or other persons who consent to testify on its behalf with respect to the matters set forth in Schedule A. The Person(s) so designated shall be required to testify as to each of those matters known or reasonably available to Ocher Rose, L.L.C.

Ocher Rose, L.L.C. is requested to identify in writing to the Government Parties and Committees, on or before January 14, 2020, each witness who will testify on its behalf and the subject-matters on which each witness will testify.

You are invited to attend and cross-examine.

Dated: January 8, 2020
New York, NY

Respectfully submitted,

s/ Luc A. Despins

PAUL HASTINGS LLP

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*Counsel for the Official Committee of Retired
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CERTIFICATE OF SERVICE

I hereby certify that, on January 8, 2020, I caused a copy of the foregoing *Notice of 30(b)(6) Deposition of Ocher Rose, L.L.C.* to be sent by email to the following individuals:

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/s/ Margaret A. Dale
Margaret A. Dale

SCHEDULE A

DEFINITIONS

As used herein, the following terms shall have the stated meanings:

The terms “all”, “any”, and “each” shall be construed as all, any, and/or each as necessary to bring within the scope of the discovery request all responses that otherwise could be construed to be outside of its scope.

The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

The use of the singular form of any word shall include the plural and vice versa.

1. “Borrowing” means any structure by which a borrower receives funds in exchange for a promise to repay them, including but not limited to obtaining a loan and selling bonds or other debt securities.

2. “Commonwealth” means the Commonwealth of Puerto Rico.

3. “Communication” or “communications” means any oral, written or electronic transmission of information, including without limitation, meetings, discussions, conversations, telephone calls, e-mail messages, memoranda, letters, analyst reports, telecopies, telefaxes, telexes, conferences, seminars, messages, notes, video tapes, photographs, microfilm, microfiche, magnetic disks, or other media of any kind.

4. “Diligence” means all actions, inquiries, and investigations undertaken by You to determine the validity and legality of the ERS Bond Issuance, and the existence of any defect in the ERS Bond Issuance, at any time, including but not limited to: (a) the subject of the action, inquiry, or investigation; (b) all Individuals involved in the action, inquiry, or investigation; (c) the reasons for the action, inquiry, or investigation; and (d) the findings and results of the action,

inquiry, or investigation.

5. “Document” or “documents” is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), made applicable to this proceeding by Bankruptcy Rule 7034 and Section 310 of PROMESA (48 U.S.C. § 2170), including but not limited to any kind of written, audio, or graphic matter, however produced or reproduced, whether or not sent or received, including, but not limited to, writings, communications, contracts, reports, presentations, pro formas, analyses, spreadsheets, correspondence, memoranda, e-mail, recordings, telephone records, notes, charts, graphs, drawings, photographs, telephone records, voice mail, audio and video recordings, data compilations, computer databases, records, and any information generated or stored in electronic form.

6. “ERS” means the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.

7. “ERS Bonds” means the senior and subordinate pension funding bonds purportedly issued by ERS pursuant the Resolution, in the aggregate original principal amount of approximately \$2.9 billion.

8. “ERS Enabling Act” means Act No. 447 of the Legislative Assembly of Puerto Rico, approved May 15, 1951, as amended and supplemented.

9. “ERS Title III Case” means the case commenced on May 21, 2017 by the Oversight Board, on behalf of ERS, under Title III of PROMESA.

10. “Fiscal Agent” is defined to be synonymous in meaning and equal in scope to the usage of this term in the Resolution. Resolution § 801 & Exh. B, VI-34.

11. “Including” means including, but not limited to, the referenced subject.

12. “Offering Statement” or “Offering Statements” means any of the offering statements for the ERS Bonds.

13. “Person” means any individual or legal organization or entity.

14. “Relating to”, “relate to”, “related to”, “referred to”, “refer to”, “reference”, and “referring to” mean analyzing, addressing, concerning, consisting of, regarding, referring to, refuting, discussing, describing, evidencing, constituting, comprising, containing, setting forth, showing, disclosing, explaining, summarizing, memorializing, reflecting, commenting on, or otherwise having any logical or factual connection to the subject matter of the Document.

15. “Resolution” means the bond resolution dated January 24, 2008, pursuant to which the ERS Bonds were issued.

16. “You” or “Your” means Ocher Rose, L.L.C., as well as its affiliates, predecessors, successors, partners, parent company, subsidiaries, principals, officers, directors, attorneys, agents, employees, representatives, and other Persons acting on its behalf.

DEPOSITION TOPICS

1. Your review of the ERS Enabling Act prior to Your purchase or acquisition of ERS Bonds.

2. Your review of the Offering Statement prior to Your purchase or acquisition of ERS Bonds.

3. Your understanding of the term “direct placement” as that term is customarily used in finance and as that term is used in the specific context of the ERS Bonds.

4. Your understanding of the term “colocaciones directas de deuda” as that term is customarily used in finance and as that term is used in the specific context of the ERS Bonds.

5. Any evaluation You made concerning the validity or legality of the ERS Bonds.

6. Your purchase or acquisition of ERS Bonds, including any diligence performed in connection with such purchase or acquisition, whether Your purchase or acquisition was in the open/secondary market, and any assignment of claims You received in connection with Your purchase or acquisition of ERS Bonds.

7. Your awareness, knowledge, and/or understanding of authority other than the ERS Enabling Act that permits ERS to issue bonds or engage in debt financing.

8. Your awareness of any loans from the Government of Puerto Rico or the United States made as part of the 2008 ERS Bond Issuance.

9. Your awareness, knowledge, and/or understanding of any loans from any financial institution made as part of the 2008 ERS Bond Issuance.

10. Your awareness, knowledge, and/or understanding, if any, of how the public purchased ERS Bonds in 2008 (including through the use of underwriters)

11. Your record ownership or lack of record ownership of any ERS Bond.

12. Any security interest or lien You claim to have on ERS assets relating to the ERS Bonds.

13. Any notice of default You provided to the Fiscal Agent concerning the ERS Bonds.

14. Your awareness of any notice of default any ERS Bondholders provided to the Fiscal Agent concerning the ERS Bonds.

15. Your awareness, knowledge, and/or understanding of whether the Fiscal Agent declined any request of any ERS Bondholders to exercise its powers under Section 1102 of the ERS Bond Resolution.

16. Your awareness, knowledge, and/or understanding of the provisions, or absence

thereof, authorizing the issuance of public debt in government and/or municipal securities You purchased or acquired other than the ERS Bonds.

17. The Borrowing authority of issuers of government and/or municipal securities You purchased or acquired other than the ERS Bonds.

18. Tracing of any ERS assets to any liens the ERS Bondholders claim to have on those assets prior to the commencement of these Actions.

19. Your responses and supplemental responses to the Interrogatories served by the Committees and Government Parties.

20. Your responses and supplemental responses to the Requests for Admission served by the Committees and Government Parties.